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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MAXIMILLIAN KLEIN, *et al.*,

Plaintiff,

vs.

FACEBOOK, INC.,

Defendant.

**CASE NO. 20-cv-08570-LHK;  
CONSOLIDATED with *Loveland v. Facebook*,  
No. 3:21-cv-03300; and *Rosenman v Facebook*,  
No. 5:21-cv-02108**

**LOVELAND PLAINTIFFS' RESPONSE TO  
DEFENDANT FACEBOOK, INC.'S  
ADMINISTRATIVE MOTION FOR  
CLARIFICATION OF ORDERS  
CONSOLIDATING *LOVELAND* AND  
*ROSENMMAN* WITH *KLEIN***

Judge: Hon. Lucy H. Koh

1 Plaintiffs Sally Loveland, Sharon Cheatle, and Janine Cortese (“Loveland Plaintiffs”)  
2 hereby respond to Facebook’s Administrative Motion for Clarification, ECF No. 190 (“Mot.”), as  
3 permitted by N.D. Cal. Civil. L.R. 7-11(b). Loveland Plaintiffs, agree and join in the *Klein*  
4 Consumer Plaintiffs’ Response. Loveland Plaintiffs agree that Facebook’s position that the  
5 Loveland Plaintiffs must either be added as named Plaintiffs in a consolidated complaint or  
6 dismiss their claims is incorrect. Loveland Plaintiffs also agree that a stay of their matter, is an  
7 appropriate method of balancing the need for efficiency and the protection of the Loveland  
8 Plaintiffs’ rights.

9 Loveland Plaintiffs write separately only to ask that the Court implement the stay but  
10 revisit it after the Court has ruled on Facebook’s Motion To Dismiss the Consolidated Consumer  
11 Class Action Complaint. Loveland Plaintiffs also submit their own Proposed Order consistent  
12 with that suggested result.

13 Dated: November 15, 2021

HENNIG KRAMER RUIZ & SINGH, P.C.

14 /s/ Rob Hennig  
15 Rob Hennig

16 Attorneys for Loveland Plaintiffs  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2021, the foregoing document was transmitted to the Clerk's Office using the CM/ECF System, causing the document to be electronically served on all attorneys of record.

Dated: November 15, 2021

By /s/ Rob Hennig  
Rob Hennig